

# EXHIBIT 1

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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH  
CENTRAL DIVISION, SOUTHERN REGION**

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**BLUERIBBON COALITION, INC.,**

Plaintiff,

v.

**BUREAU OF LAND MANAGEMENT, *et al.*,**

Defendants,

and

**SOUTHERN UTAH WILDERNESS  
ALLIANCE,**

Proposed Defendant-Intervenor.

Case No. 4:25-cv-00044-AMA-PK

**DECLARATION OF RAY BLOXHAM**

Judge Ann Marie McIff Allen  
Magistrate Judge Paul Kohler

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I, **RAY BLOXHAM**, declare as follows:

1. I have personal knowledge of each of the facts set forth below, and if called upon to do so, could and would testify regarding the following. This declaration is filed in support of the Southern Utah Wilderness Alliance's Motion to Intervene in the above-captioned matter.

2. I am the Field Director for the Southern Utah Wilderness Alliance (SUWA), where I have worked since 1999. The Field Director position requires me to spend considerable time on the ground visiting public lands throughout Utah. In this capacity, I have traveled extensively throughout the public lands in Utah. In particular, I have spent extensive amounts of time visiting and advocating to protect the public lands within the Henry Mountains/Fremont Gorge region of Utah.

3. I am an active member of SUWA.

4. SUWA, based in Salt Lake City, Utah, has nearly 12,000 members, many of whom reside in Utah. SUWA's mission is to preserve the outstanding wilderness and other sensitive public lands across Utah, and to manage these lands in their natural state for the benefit of all Americans. SUWA promotes local and national recognition of the region's unique character through research and public education; supports both administrative and legislative initiatives to permanently protect Utah's wild places within the National Wilderness Preservation System or by other protective designations where appropriate; builds support for such initiatives on both the local and national levels; and provides leadership within the conservation movement through its advocacy for wilderness preservation.

5. SUWA members and staff have a well-demonstrated interest in the preservation and protection of Utah's remarkable BLM-managed public lands, as well as in BLM's compliance with federal environmental laws and the preservation and protection of wildlife, vegetation, and cultural resources in the region. SUWA takes an active role in providing information to the BLM regarding the agency's day-to-day management activities and participates in all levels of the BLM's decision-making process.

6. SUWA members and staff also participate in information gathering and dissemination, education and public outreach, commenting upon proposed government actions, and other activities relating to the management of and impacts on BLM lands, including lands within the Henry Mountains/Fremont Gorge Travel Management Area (TMA). SUWA members benefit from BLM's compliance with federal environmental laws and agency regulations, and expect that BLM will comply with those laws and regulations. Likewise, SUWA members

benefit from and expect BLM's compliance with settlement agreements entered into with SUWA.

7. SUWA members and staff enjoy recreating, sightseeing, birdwatching, photography, backpacking, hiking, canyoneering, packrafting, camping, cultural sightseeing and exploration, and other activities on public lands in the Henry Mountains/Fremont Gorge areas, which are the subject of BLM's Henry Mountains/Fremont Gorge Travel Management Plan (TMP) and is the subject of the above-captioned matter. SUWA members and staff use and enjoy the public lands encompassed in the Henry Mountains/Fremont Gorge TMP as well as the lands adjacent to the routes at issue and the lands in the greater region.

8. SUWA members' and staff's recreational, aesthetic, scientific, informational, and other interests are directly affected by BLM's decision in the above-captioned matter, and would be harmed if the Court reverses, sets aside, modifies or remands that decision. In particular, BLM decided not to designate for public motorized vehicle use 612 of miles routes within the TMA, many of which are illegally-created user trails. Many of these 612 miles are located within BLM natural areas, BLM-identified lands with wilderness characteristics and proposed for wilderness designation in America's Red Rock Wilderness Act (ARRWA), and/or riparian areas along the Dirty Devil River, Fremont River, Muddy Creek, and many streams and washes. Additionally, many of these routes either do not exist on the ground or are disappearing; that is, they have either never been driven or were used for some moment in time in the past but are reclaimed or are actively reclaiming.

9. Because SUWA's interests and those of its staff members are affected by BLM's travel management decisions, including for the Henry Mountains/Fremont Gorge areas, SUWA

and I were heavily involved in challenging the BLM's 2008 Richfield resource management plan and its step-down travel management plan. It was that SUWA-led litigation that ultimately resulted in the Henry Mountains/Fremont Gorge TMP and decision at issue in this case.

10. In June 2024—after BLM released preliminary alternative route networks—SUWA submitted public comments to BLM that identified issues BLM was required to consider in travel planning. In October 2024, SUWA provided comments on BLM's draft environmental assessment. Those comments included route-specific information, maps, and photo documentation. They also highlighted BLM's obligation to comply with federal laws and regulations including, but not limited to, National Environmental Policy Act, the National Historic Preservation Act, and their implementing regulations, as well as the “minimization criteria” found at 43 C.F.R. § 8342.1.

11. The lands encompassed by the TMP are part of the Henry Mountains/Fremont Gorge TMA which is located in Wayne and Garfield Counties, nestled between Capitol Reef National Park to the west and Glen Canyon National Recreation Area to the south and east. It also surrounds the Horseshoe Canyon unit of Canyonlands National Park. The TMA includes several wilderness study areas (WSAs), including the Mount Ellen-Blue Hills, Bull Mountain, Mount Pennell, Mount Hillers, Little Rockies, Fiddler Butte, Dirty Devil, and Upper Horseshoe Canyon WSAs. It includes BLM Natural Areas that were designated in 2008 by BLM to protect their natural wilderness values including Wild Horse Mesa, Ragged Mountain, and several areas adjacent to Capitol Reef National Park, Dirty Devil WSA, Mount Pennell WSA, and Mount Ellen WSA. It also includes numerous BLM-identified lands with wilderness characteristics units, including the Fremont Gorge, Factory Butte, Red Desert, Muddy Creek, Long Canyon, and

Bullfrog Creek units, as well as citizen-proposed wilderness areas such as the Flat Tops, Ragged Mountain, and Cane Springs Desert areas. All of these areas are proposed for wilderness designation in ARROWA.

12. I use and enjoy the public lands and natural resources within the Henry Mountains/Fremont Gorge TMA for many health, recreational, spiritual, educational, aesthetic, and other purposes and have done so for decades. This is one of the most interesting places to visit in Utah amongst the millions of acres of stunning BLM-managed land in the state. The Henry Mountains' rugged, remarkable, and sublime natural beauty never disappoints. I enjoy the incredible scenic and open views, the alpine and sandstone landscapes, its remote and largely untrammelled nature, the rare entrenched desert rivers of the Muddy Creek, Fremont River, and Dirty Devil River (along with countless creeks and streams flowing down from the Henry Mountains), the exceptionally colorful and amazing raw badlands complexes, the serene quiet, prehistoric resources, and the native vegetation. I have visited the Henry Mountains/Fremont Gorge area, including the lands at issue in the travel plan, many times since the 1990s and most recently in March 2025. I have hiked, boated, walked, backpacked, canyoneered, explored and camped throughout vast sections of the TMA, and am familiar with the routes subject to the Henry Mountains/Fremont Gorge TMP. In addition to other countless other canyons, reefs, ridges and locations, I have hiked and explored on or in close proximity to many of the routes at issue in the TMP including around and onto WYBD0137, WYBD0187b, WYBD0115, WYBD0106, WYBD0108, WYBD0343a, WYBD0340, WYBD0342, WYBD0354, WYBD03555a, WYBD0357, WYBD0358a, WYBD0292b, WYBD0309, WYBD0293b, WYBD0258, WYNC0011d, WYNC0011b, WYNC0045c, WYNC0047c, WYNC0040c,

WYNC0045b, WYNC0018, WYNC0066a, WYNC0081, WYNC0077a, WYNC0075, WYHM0180, WYHM0145a, WYHM0139, WYHM0136a, WYHM0136, WYHM0135b, WYHM0135c, WYHM0135d, WYHM0102, WYHM0120, WYHM0117, GABD0054, GABD0317e, GABD0052, GABD0049, GABD0045, GABD0044, GABD0037, GABD0033, GABD0118, GABD0035a, GABD0512a, GABD0512, GABD0514, GABD0509, GABD0505b, GABD0105, GABD0099, GABD0100, GABD0107, GABD0108, GABD0086, GABD0087, GABD0083, GAHM0490a, GAHM0487a, GAHM0454, GAHM0442e, GAHM0442c, GAHM0449a, GAHM0455a, GAHM0494b, GAHM0079, GAHM0085a, GAHM0085, GAHM0085e, GAHM0100, GAHM0102, GAHM0101, GAHM0107, GAHM0293a, GAHM0274a, GAHM0264a, GAHM0183, GAHM0141, GAHM0143, GAHM0133, GAHM0021, GAHM0021a, GAHM0022, GAHM0015a, and GAHM0016. I intend to return to the Henry Mountains/Fremont Gorge area as often as possible but certainly within the next year.

13. With regard to approximately 612 miles of routes identified within the TMA, the BLM's decision in the Henry Mountains/Fremont Gorge TMP not to designate these routes for public motorized vehicle use minimizes the threat of OHV-related damage to some parts of this stunning natural and cultural resources found within this landscape. This decision benefits my interests in seeing these lands protected and preserved in their natural state. It will also allow me to enjoy these spectacular places without the incessant noise from OHVs and the sight of OHV-caused damage which has detracted from my experience and enjoyment of these areas on previous trips. Specifically, the TMP ensures that reclaimed routes and routes with cryptobiotic soils and/or mature black brush will not be impacted by motorized use. This will allow the decades of reclamation to continue, further enhancing the visual and natural resources of the

area, and will prevent routes that no longer exist on the ground from being re-established and introducing new damage to soils, vegetation, and fragile riparian areas. In addition, BLM's decision to not designate the 612 miles of routes will minimize the off-trail impacts associated with OHV non-compliance.

14. That said, the Henry Mountains/Fremont Gorge TMP also authorized motorized use on 1,670 miles of routes to motorized vehicle use, including in WSAs. Thus, the threat of OHV damage in areas open to motorized vehicle use remains and harms SUWA's and my interests, particularly where open routes cross through or nearby riparian areas and wilderness-quality lands.

15. I, and SUWA, have worked for years to protect public lands, including within the Henry Mountains/Fremont Gorge TMA, from adverse OHV impacts. In addition to work related to the resource management and travel management planning processes culminating in the Henry Mountains/Fremont Gorge TMP, since around 2010, SUWA and myself have collaborated with BLM and coordinated volunteer and staff programs to restore OHV-damaged areas within the TMA.

16. An order by the court to reverse, vacate, set aside, or enjoin the Henry Mountains/Fremont Gorge TMP will harm SUWA's and my interests in protecting and preserving the public lands within these areas because the threat of additional adverse OHV impacts on the subject routes would be created or revived. I am concerned about the proliferation and extensive use of OHVs in the Henry Mountains/Fremont Gorge areas, particularly in sensitive riparian areas, lands proposed for wilderness designation in ARROW, near prehistoric and historic resources, and where routes do not exist on the ground or are reclaiming. Allowing



OHVs on the routes designated as closed to public motorized use in the Henry Mountains/Fremont Gorge TMP will further degrade naturalness, harm or destroy cultural resources, create additional dust and pollution, disturb wildlife, lead to route proliferation into sensitive resources, and increase ambient background noise levels. Based on my decades of experience and familiarity with this area, I expect that OHV use will also spread onto reclaimed and non-existent routes, compromising the wilderness characteristics of these areas, and resulting in other regrettable impacts like looting and vandalism. These activities will directly affect and irreparably harm my interests, including my recreational and aesthetic interests, in these lands. I do not want to see or hear such OHV activity expand, nor do I want OHV use to further expand into the wild areas of the Henry Mountains, Fremont Gorge, Dirty Devil, and other public lands within the TMA.

17. My injuries and harms discussed above will be prevented by a decision by the court affirming BLM's Henry Mountains/Fremont Gorge TMP.

I DECLARE, under penalty of perjury, that the foregoing is true and correct.

DATED: April 21, 2025



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Ray Bloxham